

EXHIBIT A TO ORDER

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF DELAWARE

In re:

WOODBRIDGE GROUP OF COMPANIES,
LLC, *et al.*,¹

Remaining Debtors.

MICHAEL GOLDBERG, as Liquidating Trustee of
the Woodbridge Liquidation Trust, successor in
interest to the estate of Woodbridge Group of
Companies, LLC, *et al.*,

Plaintiff,

v.

[DEFENDANT NAME],

Defendant.

Chapter 11

Case No. 17-12560 (BLS)

(Jointly Administered)

Adv. Proc No. 19- _____ (BLS)

**STIPULATION TO TOLL
DISCOVERY UNTIL AFTER THE CONCLUSION OF MEDIATION**

Plaintiff Michael Goldberg, (the “Plaintiff”), as Liquidating Trustee of the Woodbridge Liquidation Trust, successor in interest to the estate of Woodbridge Group of Companies, LLC, *et al.*, and the above-captioned defendant (the “Defendant” and together with the Plaintiff, the “Parties”), hereby agree and stipulate that, in according with the scheduling order dated _____, 2020, discovery shall be tolled until after the filing of a mediator’s Certificate of Completion pursuant to Local Rule 9019-5(f)(ii).

¹ The Remaining Debtors and the last four digits of their respective federal tax identification numbers are as follows: Woodbridge Group of Companies, LLC (3603) and Woodbridge Mortgage Investment Fund 1, LLC (0172). The Remaining Debtors’ mailing address is 14140 Ventura Boulevard #302, Sherman Oaks, California 91423.

Dated: _____, 2020

[FIRM]

PACHULSKI STANG ZIEHL & JONES LLP

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